

Dear FCC,

Given that localism is something the FCC values (and should),
And
Given that translators are by definition NOT locally programmed,
And
Given that LPFM stations ARE by definition locally programmed,
THEREFORE
LPFM should have "Primary Status" over translators.

Please note that many folks have written to complain that the audience of K-Love and other religious translator networks are underserved.

A simple scan of any radio dial in most areas of the country will show that to be not true.
In Richmond alone there are 8 full power full time gospel and "The Word" radio stations.

FURTHERMORE the "Translator Invasion" of March 2003 had over 13,000 applications for translators OFTEN WITH MULTIPLE TRANSLATORS ALL PLANNING TO CARRY THE SAME PROGRAMMING FROM THE SAME STATION THAT WAS ALREADY DUPLICATED IN THAT AREA.

This was only true for the religious networks.

No one else to my knowledge planned to spend money to create multiple frequencies redundantly carrying the exact same programming from the same primary station for an area. It appears the only reasons to file for so many stations to carry the same content are to either sell the Construction Permits for those translators and/or to block smaller local churches or civic organizations from being able to build LPFMs in the future.

These networks have demonstrated by their actions ("By their fruits ye shall know them") that they want to flood the airwaves with redundant content or bald-faced greed and gluttony that run counter to the interests of a "Fourth Estate" of media that can carry as full a breadth possible of citizen thought, oversight on government, and civic engagement as well as diverse views on the nature of human nature and the divine.

The bottom line is this:

Humanity is flawed in our ability to perceive reality and "Truth" and thus we rely on a wide variety of viewpoints to compare, contrast, speak the truth as we all see it and thus stumble our way toward truth.

The beginning of the end for every civilization has been anything that destroyed that civilization's ability to discern the truth whether that be due to ignorance of reality as testable by science, or because ideology clouded the vision of the leadership. Given that humanity now has the means to sterilize planet Earth in Nuclear Holocaust, it is all the more VITAL that as many viewpoints as possible be accommodated by the Fourth Estate, of which radio is a vital part. Allowing these massive translator networks with redundant

coverage from hundreds and thousands of miles away is counter to the education of the "enlightened self-interest" upon which the American System relies.

Thus again, I propose that LPFM should have primary status over translators.

Thank-you for your time,

Sincerely,
Christopher Maxwell
President: Virginia Center for Public Press